

Brian Chenoweth, OSB No. 944991
Andrea Meyer, OSB No.136055
Chenoweth Law Group, PC
510 SW Fifth Avenue, Fifth Floor
Portland, OR 97204
Telephone: (503) 221-7958
Facsimile: (503) 221-2182
E-mail: brian@northwestlaw.com
E-mail: ameyer@northwestlaw.com
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland Division

MAJED QUAIZ,

Plaintiff,

v.

**ROCKLER RETAIL GROUP, INC., and
ROCKLER COMPANIES, INC.,**

Defendants.

Case No. 3:16-cv-01879-SI

**DECLARATION OF ANDREA R.
MEYER (February 22, 2017)**

I, Andrea R. Meyer, do hereby declare as follows:

1. I am over the age of 18 and competent to testify in this declaration. If called to testify, I could give the testimony below.
2. I am an attorney with Chenoweth Law Group, PC (“CLG”), which represents Plaintiff Majed Quaiz (“Plaintiff”) in this matter.
3. On October 13, 2016, at the request of Defendants’ counsel, John Weyrauch, I emailed Mr. Weyrauch with the 14 drawings referenced in the amended complaint.

4. On December 27, 2016 Mr. Weyrauch, Brian D. Chenoweth, and I conducted a Rule 26(f) conference. The attorneys all agreed that a protective order would be necessary in this case due need to exchange confidential information.

5. Defendants have not served Plaintiff with any discovery requests to date.

6. Plaintiff served requests for production on each Defendant on January 17, 2017. Defendants both responded on February 16, 2017. Plaintiff's Request No. 1 requests production of "[a]ll documents related to your design or development of any Corner Clamp." The requests define "Corner Clamp" to refer to "any mechanism or design that operates as a right-angle corner clamping jig, including but not limited to the Clamp-It® Corner Clamping Jig.

7. Defendants Responses to Plaintiff's Requests for Production contain innumerable objections to simple requests and include the assertion that each of them "lacks sufficient information and understanding of Plaintiff's alleged trade secrets to respond" to certain requests. Attached as **Exhibit 1** is a true copy of *Rockler Companies, Inc.'s Response to Plaintiff's Request for Production*. Attached as **Exhibit 2** is a true copy of *Rockler Retail Group, Inc.'s Response to Plaintiff's Request for Production*.

8. Defendants served their initial disclosures on Plaintiff on January 27, 2017. Defendants provided Plaintiff with their initial disclosures. Defendants' disclosures list five individuals likely to have discoverable information that Defendants may use to support their claims or defenses. Defendants disclose two individuals, "Doe 1" and "Doe 2" that Defendants assert have information related to the development of Rockler's corner clamping jig. Defendants also list 11 categories of documents which it may use in support of its claims or defenses.

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I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

Dated: February 22, 2017

CHENOWETH LAW GROUP, PC

/s/ Andrea R. Meyer

Brian D. Chenoweth, OSB No. 944991

brianc@northwestlaw.com

Andrea R. Meyer, OSB #136055

ameyer@northwestlaw.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing true copies of **DECLARATION OF ANDREA R. MEYER (February 22, 2017)** on the following:

John M. Weyrauch
Peter R. Forrest
Dicke, Billig & Czaja, PLLC
100 South Fifth Street
Suite 2250
Minneapolis, MN 55402
jmweyrauch@dbclaw.com
pforrest@dbclaw.com

*Attorneys for Defendant Rockler
Retail Group, Inc. and Rockler
Companies, Inc.*

Klaus H. Hamm
Klarquist Sparkman, LLP
One World Trade Center
121 SW Salmon Street
Suite 1600
Portland, Oregon 97204
klaus.hamm@klarquist.com

*Attorneys for Defendant Rockler
Retail Group, Inc. and Rockler
Companies, Inc.*

by the following method(s):

_____ by **mailing** a full, true and correct copy thereof in a sealed, first-class, postage pre-paid envelope, addressed to the last-known address of the parties as shown above, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.

 X by **emailing** a full, true and correct copy thereof to the parties at the email addresses shown above, which are the last-known email addresses of the parties, on the date set forth below.

_____ by **faxing** a full, true and correct copy thereof to the parties at the fax number shown above, which is the last-known fax number of the parties, on the date set forth below. The receiving fax machine was operating at the time of service and the transmission was property completed.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

Dated: February 22, 2017

CHENOWETH LAW GROUP, PC

/s/ Andrea R. Meyer
Andrea R. Meyer, OSB No. 136055

CERTIFICATE OF SERVICE